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October 3, 2019

VIA ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: United States v. Akshay Aiyer, 18-CR-00333 (JGK)

Dear Judge Koeltl:

We represent Defendant Akshay Aiyer in the above-referenced action. We write to request an amendment to the Agreed-Upon Protective Order in effect in this case (ECF No. 13).

The amendment would extend the Order's protections to documents produced by nonparty subpoena recipients. Attached to this letter are the proposed amended order and a redline documenting all changes. The Government has reviewed these attachments and has no objections to the amended order.

Respectfully submitted,

/s/ Martin Klotz

Martin Klotz

cc: All Counsel of Record (via ECF)